

COOPER & DUNHAM LLP

ATTORNEYS AT LAW

1185 AVENUE OF THE AMERICAS, NEW YORK, NEW YORK 10036

TELEPHONE: (212) 278-0400

CHRISTOPHER C. DUNHAM	IVAN S. KAVRUKOV
NORMAN H. ZIVIN	PETER D. MURRAY
JOHN P. WHITE	WILLIAM E. PELTON
ROBERT B.G. HOROWITZ	ROBERT D. KATZ
ERIC D. KIRSCH	PAUL TENG
GARY J. GERSHIK	PETER J. PHILLIPS
WENDY E. MILLER	RICHARD S. MILNER
ROBERT T. MALDONADO	RICHARD F. JAWORSKI
MARIA V. MARUCCI	AUDE GERSPACHER
JEFFREY C. SHIEH	BRIAN J. AMOS
TONIA A. SAYOUR	GREGORY J. CARBO
ASHOK G. CHANDRA*	JOSEPH A. SHERINSKY*
LISA E. HORWITZ*	HINDY R. DYM*

FACSIMILE: (212) 391-0525  
(212) 391-0526  
(212) 391-0630  
(212) 391-0631  
(212) 827-0247

April 16, 2008

SCIENTIFIC ADVISOR  
JAMES R. MAJOR, D. PHIL.  
AMANDA L. WILLIS, PH.D.

FOUNDED 1887  
www.cooperdunham.com

\*NEW YORK STATE BAR ADMISSION PENDING

**BY ECF**

Honorable Robert P. Patterson  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2250  
New York, New York 10007

Re: Coach Services, Inc. v. Vani U.S.A. Inc.  
Civil Action No. 07-Civ-08354 (RPP)  
Our Docket No. 7162/77769

Dear Judge Patterson:

Plaintiff, COACH SERVICES, INC. ("Coach"), hereby requests a pre-motion conference to discuss an order, pursuant to Rule 37 F.R.Civ.P., compelling defendants GUANGZHOU WEINI LEATHER CO. LTD. ("Weini") and GUANGZHOU HUANI CO. LTD. ("Huani") to answer Coach's first request for production of documents and things, served December 21, 2007, and to produce the documents and things requested therein. A copy of the request, which was addressed to all defendants, is attached as Exhibit A.

On March 14, 2008, defendants VANI USA, INC. ("Vani") and L.A. VANI, INC. ("LA Vani") responded to Coach's document requests. However, as shown by the response, a copy of which is attached as Exhibit B, defendants Weini and Huani did not respond. Defendants' counsel stated that:

"Defendants Guangzhou Huani and Guangzhou Weini have not responded to our attempts to contact them since they terminated their relationship with us. Accordingly, we are only able to reference materials that they had previously provided to us, which were already produced to Plaintiff in Defendants' initial disclosure." (pp. 1-2)

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Coach's undersigned counsel communicated with defendants' counsel by letter of March 20, 2008 (attached as Exhibit C), and by subsequent telephone conferences and email and at a personal conference on April 14, 2008, but no responses have been received, and defendants' counsel does not expect that they will receive further information or documents from Weini or Huani.

Therefore, it is respectfully requested that the Court hold a conference or otherwise issue an order that defendants Huani and Weini respond to discovery forthwith, and for such other and further relief as the Court deems just and proper.

Respectfully,

/s/ Norman H. Zivin

Norman H. Zivin (NZ-6053)  
Attorney for Plaintiff

NHZ/ef  
Enclosures

cc: Frances P. Hadfield, Esq. (by ECF)